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January 30, 2018

Via Electronic Mail
Ms. Kerstin W. Sutton, Esq.
kws@suttonlindsay.com

Re: *Ariana Qayumi v. Duke University*
MDNC No. 1:16-CV-1038

Dear Ms. Sutton,

I am writing pursuant to Local Rule 5.4(c) and Paragraph 21(a) of the Consent Protective Order [ECF No. 35] entered in the above referenced case, to your clients' position on confidentiality designations for specific documents that Duke produced to Plaintiff in discovery.

The documents at issue are attached to the email transmitting this letter. Duke has designated these documents as "CONFIDENTIAL" and subject to the terms of the Consent Protective Order. Plaintiff anticipates filing these documents, (in addition to other documents designated as confidential that have already been filed under seal) as exhibits in support of her opposition to Duke's motion for summary judgment. Therefore, under Local Rule 5.4(c), Ms. Qayumi seeks your clients' position as to which portions of these documents, if any, should be redacted or placed completely under seal. To that end, please provide me with a redacted version of the accompanying documents for filing.

Ms. Qayumi's response to Duke's summary judgment motion is due by midnight on February 1, 2018. As such, please return the documents to me by 5:00 p.m. on February 1, 2018. If your clients do not offer a position on these documents by this time, Ms. Qayumi will assume that Duke's confidential designations apply equally to your clients and (a) file the entire documents under seal and fully redact "public" copies, based on Duke's designation; and (b) advise the Court in Ms. Qayumi's motion to seal that these documents are being filed fully under seal because your clients counsel did not respond to this request to confer pursuant to Local Rule 5.4.

Ms. Kerstin W. Sutton, Esq.

January 31, 2018

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I am prepared to discuss this issue further should you wish to do so. You may reach me anytime on my direct line: (919) 452-4647.

Sincerely,



Robert C. Ekstrand

Enclosures (via electronic mail)

cc: Dixie Wells, Esq. (w/o enclosures, via electronic mail)
Thomas Segars, Esq. (w/o enclosures, via electronic mail)
Christopher Jackson, Esq. (w/o enclosures, via electronic mail)

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